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[Additional Counsel Listed on Following Page]

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

IN RE: UBER TECHNOLOGIES, INC.,
PASSENGER SEXUAL ASSAULT
LITIGATION

Case No. 3:23-md-03084-CRB

**STIPULATION AND ~~[PROPOSED]~~ ORDER
REGARDING HEARING ON PLAINTIFFS'
MOTION TO ENFORCE PTO NO. 2 AND
TO COMPEL DEFENDANTS TO PRODUCE
LITIGATION HOLD AND PRESERVATION
INFORMATION**

This Document Relates to:

ALL ACTIONS

Judge: Hon. Lisa J. Cisneros
Courtroom: G – 15th Floor

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Co-Lead Counsel for Plaintiffs

STIPULATION

WHEREAS, on December 14, 2023, Plaintiffs filed their Motion to Enforce PTO No. 2 and to compel Defendants Uber Technologies, Inc., Rasier, LLC, and Rasier-CA, LLC (collectively “Uber”) to produce litigation hold and preservation information (the “Motion”);

WHEREAS, the parties have met and conferred about the issues in dispute in Plaintiffs’ Motion and an expedited briefing schedule for said Motion;

WHEREAS, the parties agreed to resolve Plaintiffs’ Motion on an expedited briefing schedule with Defendants’ Response to Plaintiffs’ Motion due on December 22, 2023 and Plaintiffs waiving the filing of a Reply to Defendants’ Response;

WHEREAS, on December 18, 2023, Judge Cisneros ordered that Defendants’ Response to Plaintiffs’ Motion would be due on December 22, 2023 and reset the hearing to January 4, 2024 at 1:30 p.m.;

WHEREAS, Uber’s counsel handling the argument of this Motion is unable to attend the January 4, 2024 hearing due to an unexpected serious illness;

WHEREAS, Plaintiffs’ counsel handling the argument of this Motion is traveling internationally the morning of January 10, 2024 and therefore agreed as a matter of professional courtesy to a continuance of the hearing until Monday, January 8 or Tuesday, January 9, 2024 before 1:30 p.m. PT; and

THEREFORE, the parties respectfully request the Court enter the parties’ stipulation that:

1. The January 4, 2024 hearing on Plaintiffs’ Motion to Enforce PTO No. 2 and to Compel Defendants to Produce Litigation Hold and Preservation Information is adjourned and will be continued to Monday, January 8 or Tuesday, January 9, 2024 before 1:30 p.m. PT.

IT IS SO STIPULATED.

1 Dated: January 3, 2024

**PAUL, WEISS, RIFKIND, WHARTON &
GARRISON LLP**

2 By: /s/ Robert Atkins

3 ROBERT ATKINS
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8 *Attorneys for Defendants*
9 UBER TECHNOLOGIES, INC.,
10 RASIER, LLC, and RASIER-CA, LLC

11 Dated: January 3, 2024

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FILER'S ATTESTATION

I, Robert Atkins, am the ECF User whose ID and password are being used to file this document. In compliance with Civil Local Rule 5-1(i)(3), I hereby attest that each of the signatories identified above has concurred in this filing.

Dated: January 3, 2024

By: /s/ Robert Atkins
Robert Atkins

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7 UNITED STATES DISTRICT COURT
8 NORTHERN DISTRICT OF CALIFORNIA
9 SAN FRANCISCO DIVISION
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11 IN RE: UBER TECHNOLOGIES, INC.,
12 PASSENGER SEXUAL ASSAULT
LITIGATION

Case No. 3:23-md-03084-CRB

13 This Document Relates to:
14 ALL ACTIONS
15

[PROPOSED] ORDER AS MODIFIED
GRANTING STIPULATION REGARDING
HEARING
ON PLAINTIFFS' MOTION TO ENFORCE
PTO NO. 2 AND TO COMPEL DEFENDANTS
TO PRODUCE LITIGATION HOLD AND
PRESERVATION INFORMATION

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17 The Court hereby GRANTS the parties' stipulation as follows:

- 18 1. The January 4, 2024 hearing on Plaintiffs' Motion to Enforce PTO No. 2 and to
19 Compel Defendants to Produce Litigation Hold and Preservation Information is
20 adjourned and will be continued to Monday, January 8 at 12:30 pm via Zoom or
21 Tuesday, January 9, 2024 before 1:30 p.m. PT.
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23 **IT IS SO ORDERED.**

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25 Date: January 3, 2024


26 HON. LISA J. CISNEROS
27 UNITED STATES MAGISTRATE JUDGE
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